

Field Audit Inspection
Summary
New Kensington Municipal Sanitary Authority
Waste Water Treatment Facility
120 Logans Ferry Road
New Kensington, PA 15068
PA0027411

The Field Audit Inspection at the New Kensington Municipal Sanitary Authority (the Facility) (**See Photo #1**) was conducted by the Office of Enforcement, Compliance and Environmental Justice (OECEJ) Region III, on March 30-31, 2015. Inspector, Jim Kline (Inspector Kline) presented his credentials to Mr. Curt Carion, Chief Operator as an authorized representative of the Agency. Mr. Carion introduced Inspector Kline to Mr. Joseph Ditty, Pretreatment Coordinator and Mr. Harry Cox Jr., Resident Project Representative-Hatch Mott MacDonald. Mr. Daniel Rowe Jr. is the Manager. Inspector Kline briefly explained the scope and time frame of the inspection to Mr. Carion.

Mr. Carion offered the following background information: The Facility was constructed in the 1956 on an approximately 10-acre parcel and operates up to ten-million gallons per day (mgd). Currently, the output is six-mgd. The Facility has undergone three major upgrades in the following areas: Secondary, Final Clarifiers and Chlorine Disinfection. Mr. Carion stated that the Facility does not accept hauled in wastes, which includes residual wastes from Oil and Gas activities. Generated sludge is hauled from the Facility and is disposed of in a landfill.

The Facility has seventeen employees (thirteen "Plant" and four administrative). Facility operations are staffed from 6:00AM until 2:00 PM on weekdays. The Facility has two employees for weekend coverage. Lab operations are staffed weekdays from 7:00 AM until 3:00 PM.

Inspector Kline was escorted to the Lab and was introduced to Mr. Keith Anderson, Lab Supervisor. The Lab has a total of four employees. The Lab is staffed from 7:00 AM until 3:00 PM. The Lab employees collect and analyze in-house grab and composite samples taken at the Facility. Mr. Anderson maintains Standard Operating Procedures (SOPs) for each parameter that the Lab tests. SOPs were dated July or August 2006. Lab solutions and calibration standards appeared to be valid without reaching expiration. As representatives, photos of the pH buffer solutions were taken (**See Photos #2, #3 & #4**). Mr. Anderson stated that equipment calibration is conducted by J. P. Technical Services (**See Photo #5**). Each piece of Lab equipment did have a copy of the equipment Operator's Manual. A representative photo of the Sartorius PP50 Meter was

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taken (**See Photo #6**). A performance verification for the meter was conducted by JP technical on 2/26/2015. A copy of the results was provided (**See Attachment #1**).

Inspector Kline requested to review documentation for Facility influent and effluent data. The Facility maintains data reports concerning this information. As a representative sample, a copy from 2/15/2015 shows recorded pertinent influent and effluent data (**See Attachment #2**).

Mr. Carion provided a wastewater flow schematic (**See Attachment #3**) and escorted Inspector Kline on a tour of the Facility starting at the Pump House. Inside the Pump House, the following are located: Influent, Bar Screens and Wet Wells. An Eutek System is used for grit removal. Outside areas toured or observed were the: Head Cells, Primary and Decant Tanks, Three (in-series) Digesters, Grease Trap, Bypass/Blending Channel, Aeration Basin, Two Final Clarifiers, Belt Press (from the Digesters), Chlorine Contact Tank, Drying Beds and the Non-potable Building (**See Photo #7**) which houses the effluent composite sampler. The Facility uses a Hach Sigma SD900 for collection of samples (**See Photo #8**). A thermometer was kept inside the refrigerated cabinet of the sampling device (**See Photo #9**). The effluent appeared clear (**See Photo #10**). There did not appear to be any visible issues at the receiving stream, the Pucketa Creek (**See Photo #11**).

The Facility NPDES permit has an effective date of June 24, 2010 and was set to expire on June 30, 2015. A NPDES permit renewal application was sent to the Pennsylvania Department of Environmental Protection on December 19, 2014 (prior to the application deadline). The Facility has retained the services of Environmental Service Labs Inc. for the analytical testing of the Industrial Users (IUs). Mr. Joseph Ditty oversees the IU Pretreatment Program. Mr. Ditty stated the Facility has five IUs. A listing of the IUs, addresses and contact persons was provided along with analytical results for sampling events for 2014 (**See Attachment #4**). The five IUs are: Castle Co-Packers, Alle-Kiski Medical Center (Citizens Ambulatory Care Center), Smithfield Farmland (Farmland Foods) Corporation, Keystone Rustproofing Inc., UniFirst Corporation and Schreiber Industrial Development Company. A June 9, 2014 letter from the Schreiber Industrial Development Company lists the tenants and the type of business operating in the Schreiber Industrial District (**See Attachment #5**).

Inspector Kline reviewed the Pretreatment Annual Report for 2014 (dated March 2015) (**See Attachment #6**). The report summarizes IU permit exceedances and actions taken by the Facility. A copy of the 2014 Pretreatment Fine Status Report lists two IUs (Keystone Rustproofing and Schreiber Industrial Development Company) as having been assessed penalties for permit exceedances (**See Attachment # 7**). The Facility has sent notices of violations to Keystone Rustproofing (Keystone) dating back to December 2011 for permit exceedances. As a representative sample, Inspector Kline requested a copy of a Notice of Violation sent by the Facility to Keystone with an issuance date of January 21, 2015 (**See Attachment #8**). The Facility provided a copy of all of the actual effluent parameter sample results since 2012, which were

recorded on an Effluent Table (**See Attachment #9**). The table shows exceedances for: cyanide, zinc, nickel, total metals and copper.

Inspector Kline reviewed IU Pretreatment Permits and requested a copy of the UniFirst Corporation as a representative sample (**See Attachment #10**). Inspector Kline reviewed inspection reports conducted by Mr. Ditty at the UniFirst Corporation on 11/21/2013 (**See Attachment #11**) and on 12/8/2014 (**See Attachment #12**). Both reports are seven-pages long. The 11/21/2013 appears to be complete with entries made in each section of the seven pages. The 12/8/2014 report only has the general information recorded on page one, with the remaining six pages not being filled out. Mr. Ditty stated that he did not know why the remaining inspection report entries were blank. Inspector Kline reviewed inspection reports conducted by Mr. Ditty at Keystone on 11/22/2013 (**See Attachment #13**) and on 12/16/2014 (**See Attachment #14**). The 11/21/2013 appears to be complete with entries made in each section of the seven pages. The 12/16/2014 report only has six lines of the general information completed on page one, with the remaining four pages not being filled out. Mr. Ditty stated that he did not know why the remaining inspection report entries were blank. Inspector Kline requested a copy of a "Sample Report" for grab and composite samples that were collected at Keystone on 12/16-17/2014 (**See Attachment #15**).

Inspector Kline selected Keystone Rustproofing, Inc. located at 1901 Dr. Thomas Boulevard Arnold, PA 15068 to continue with the field audit inspection. Inspector Kline and Mr. Ditty arrived at Keystone Rustproofing, Inc. (**See Photos #12 & #13**).

Inspector Kline met Mr. Larry Vogel, Plant Manager and presented his credentials to him as an authorized representative of the Agency. Inspector Kline briefly explained the scope and time frame of the visit to Mr. Vogel.

Ms. Vogel provided the following background information about Keystone: The operations conducted here are primarily metal finishing and electroplating. Prior to Keystone's operations, the building was used as a glass factory. Keystone has fifty employees and has around the clock operations covered in three shifts. Mr. Vogel stated that operations sometimes do occur on Saturdays, but rarely on Sundays. Mr. Vogel stated that Keystone is a large quantity generator of hazardous wastes and is routinely inspected by the Pennsylvania Department of Environmental Protection. According to Mr. Vogel, Keystone is not required to have any air permits.

Inspector Kline requested and received a copy of the process-flow diagram along with a building layout for the Keystone operations (**See Attachment #16**). Keystone has a continuous discharge of 25,000-gallons per day to the Facility. Mr. Vogel was aware of the IU permit exceedances and stated that Keystone had installed a new ultra-filtration unit from Veolia Services to correct the exceedances (**See Photo #14**). Keystone had outlined a plan with the Facility in August 2014 to come back into compliance. Mr. Vogel stated the plan is on pace and will be fully

functioning in mid-April. Mr. Ditty stated that the Facility is satisfied with the plan and the timeline is on schedule.

Mr. Vogel provided Inspector Kline and Mr. Ditty a tour of the Keystone operations including the production plating located in Building #1 and the anodizing line located in Building #2. Inspector Kline did comment that the overall general housekeeping was poor. Mr. Vogel escorted Inspector Kline and Mr. Vogel to the Water Treatment Area and specifically to where the effluent samples are collected (**See Photos #15, #16 & #17**). A flowchart and analytical data logger were also stationed in this area (**See Photos #18 & #19**). This equipment appeared to be operational. An annual calibration label was present. According to the label, the calibration expired on 5/22/2007. Mr. Vogel stated that all samples collected are grab samples. Grab samples are collected every two hours and used for the twenty-four hour composite sample. Collected samples are picked up on a bi-monthly schedule by Environmental Service Labs, Inc. Mr. Vogel stated that analytical reports for all samples collected are provided to the Facility.

Closeout Conference

Inspector Kline conducted a closeout conference at the Facility. Inspector Kline relayed his observation concerns about the Facility and Keystone Rustproofing, Inc. Inspector Kline stated that any outstanding, additional information or reports which were unavailable during the inspection could be sent to Inspector Kline.

Follow-up Communications

As of the date of preparing this report, no additional information was received by Inspector Kline.